

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

La Unión Del Pueblo Entero, et al

vs.

Case No.: 5:21-cv-00844-XR

Gregory W. Abbott, et al.

**MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Victor Genecin, applicant herein, and  
moves this Court to grant admission to the United States District Court for the Western District of  
Texas pro hac vice to represent Plaintiffs in this case, and  
would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of)  
NAACP Legal Defense & Educational Fund, Inc. with offices at:  
Mailing address: 40 Rector Street, Fifth Floor  
City, State, Zip Code: New York, NY 10006  
Telephone: 212-965-2200 Facsimile: 212-226-7592
2. Since September 2, 1982, Applicant has been and presently is a  
member of and in good standing with the Bar of the State of New York.  
Applicant's bar license number is 1828094.
3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
<u>Commonwealth of Massachusetts</u>	<u>September 1995</u>
<u>United States Supreme Court</u>	<u>July 2016</u>
<u>U.S. Court of Appeal, 1st Cir.</u>	<u>November 2007</u>

Please see attached sheet for additional courts.

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

N.A

5. I ☐ have ☒ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:

N.A.

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N.A.

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Kenneth E. Broughton, Jr. (Texas Bar No. 03087250)

Mailing address: 811 Main Street, Suite 1700

City, State, Zip Code: Houston, TX 77002-6110

Telephone: 713-469-3800

Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-l(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Victor Genecin to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Victor Genecin

[printed name of Applicant]



[signature of Applicant]

### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 19 day of April, 2022.

Victor Genecin

[printed name of Applicant]



[signature of Applicant]

**Supplemental Answer to Question 3**

<b><u>Court</u></b>	<b><u>Admission Date</u></b>
<b>U.S. Court of Appeals for the 2<sup>nd</sup> Circuit</b>	<b>July 2000</b>
<b>United States Court of Appeals for the 5<sup>th</sup> Circuit</b>	<b>June 2013</b>
<b>United States District Court for Southern District of New York</b>	<b>December 1996</b>
<b>United States District Court for Eastern District of New York</b>	<b>December 1996</b>
<b>United States District Court for Northern District of New York</b>	<b>November 2014</b>
<b>United States District Court for District of Massachusetts</b>	<b>August 2007</b>